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9 Attorney for Debtor

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12 In Re:) BK-S-19-16636-MKN
13) Chapter 11
14 CENSO, LLC.)
15) HEARING DATE:
16 Debtor.) HEARING TIME:
17 _____

18 **APPLICATION FOR ORDER SHORTENING TIME**

19 Debtor applies for an Order Shortening Time for hearing on **MOTION TO EXTEND**
20 **EXCLUSIVITY PERIOD PURSUANT TO 11 U.S.C. §105(a) AND §1121(d)**, upon the
21 grounds set forth in the accompanying Affidavit of Corey B. Beck, Esq.
22 DATED this 3rd day of February, 2020.

23 /s/ COREY B. BECK
24 COREY B. BECK, ESQ.
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29 Attorney for Debtor

1 **DECLARATION OF COREY B. BECK, ESQ. IN SUPPORT**
2 **OF ORDER SHORTENING TIME**

3 STATE OF NEVADA)
4 COUNTY OF CLARK)S.S.
5)

6 COREY B. BECK, ESQ., being first duly sworn, deposes and says:

7 1. I am an attorney at law licensed to practice and practicing in the State of Nevada,
8 and am the attorney for the Debtors herein, Censo, LLC. I make this Affidavit on
9 the Debtor's behalf in support of the within Application for Order Shortening
10 Time.

11 2. On or about October 11, 2019, the Debtors filed a petition under Chapter 11 of
12 the Bankruptcy Code (11 USC) in the above captioned case.

13 3. The Debtor's continued §341 Meeting of Creditors was rescheduled to December
14 5, 2019 at 2:00 PM.

15 4. **The 120-day exclusivity period to file a Disclosure Statement and**
16 **Reorganization Plan will expire on February 10, 2020.** This extension will
17 allow undersigned counsel and the Debtor to complete further investigation
18 and gather information. Such extension would provide the Debtor until
19 approximately until June 8, 2020 to file its Disclosure Statement and
20 Reorganization Plan.

21 5. Application to Employ Nunc Pro Tunc was heard on January 8, 2020.
22 Application was approved - undersigned counsel is submitting order which
23 indicates that there are no contacts with employees of the U.S. Trustee.

24 6. Chapter 11 Plan is for propose of reorganizing 3 investment properties; 1161
25 Dana Maple Court, 5900 Negril Avenue, and 11441 Allerton Park Dr. # 411.

26 7. Properties were obtained at HOA foreclosure sales.

27 8. State court litigation has been completed. Debtor is proper owner of
28 properties therefore, they are subject to mortgages.

9. Undersigned counsel has just received appraisals to file and obtain orders valuing investment properties.
10. In addition, undersigned counsel has researched filing an adversary action on Green Tree Servicing. The property may well be unsecured. ie description and property address is incorrect on Deed of Trust securing said property.
11. Debtor believes in good faith that the extension is necessary and proper to obtain order valuing investment properties. Debtor will also determine if adversary action as to Green Tree Servicing is appropriate. Finally, undersigned counsel will also seek agreements with secured creditors along with a vote for the plan.
12. Debtor believes in good faith that this extension is necessary and proper for the successful progress of this case and is in the best interests of creditors.
13. Facts and circumstances substantiate an immediate court hearing.
14. An expedited hearing is requested in this matter.

Affiant further sayeth not.

/s/ COREY B. BECK
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